

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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Case No.: **10-38275**  
Judge: **Susan V. Kelley**  
Chapter: **Chapter 13**

**In Re: Robert D Boyd  
Robin Renee Boyd**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Geraci Law, LLC, Attorneys for the Debtor(s), have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court  
517 E. Wisconsin Ave., Rm. 126  
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Ann R. Kramer  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Ann R. Kramer  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Robert D Boyd  
Robin Renee Boyd  
8528 Westbrook Dr  
Sturtevant, WI 53177

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponent of this modification is the Debtor(s), through their Attorneys,  
Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
  - A.  post-confirmation
  - B.  pre-confirmation (Select i. or ii.);
    - i.  Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially or adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii.  Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.

4. The reason for the modification is to lower Chapter 13 payment and surrender debtor's interest in their residence. The Debtor' income decreased. Robin Boyd lost her job and had to take a lower paying job.

5. Select A. or B.

A. X The Chapter 13 Plan confirmed or last modified on 02/22/11 (date) is modified as follows: Chapter 13 payment is lowered to \$305 for 36 more months. Section 6. (B) is amended to state that there will be no mortgage arrearages paid through the plan to Citimortgage. Section 6(C) is amended to state that the Debtors will surrender their interest in their residence located at 8528 Westbrook Dr, Sturtevant, WI.

B. \_\_\_\_\_ The unconfirmed Chapter 13 Plan is modified as follows: (See Attached Plan).

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

**6. BY SIGNING BELOW THE PROPOSER OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Friday, December 09, 2011.

By: */s/ Ann R. Kramer*

Ann R. Kramer  
Attorney for Debtor  
Bar #: 1055453

Ann R. Kramer  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Friday, December 09, 2011:

Robert Boyd  
Robin Renee Boyd  
8528 Westbrook Dr  
Sturtevant, WI 53177

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Friday, December 09, 2011:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Friday, December 09, 2011.

By: /s/ Ann R. Kramer  
Ann R. Kramer  
Attorney of the Debtor  
Bar #: 1055453

Ann R. Kramer  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Citimortgage Attn: Bankruptcy Dept. Po Box 9438 Gaithersburg, MD 20898	US Cellular Corporation C/O H E Stark Agency 6425 Odana Rd Madison, WI 53719	Verizon Wireless Bankruptcy Department PO Box 3397 Bloomington, IL 61702
Hawthorne Architectural C/O National Recovery AGEN 2491 Paxton St Harrisburg, PA 17111	Credit Management Co. Attn: Bankruptcy Dept. Po Box 1654 Green Bay, WI 54305	Gray & Associates Attn: Bankruptcy Department 16345 West Glendale Dr. New Berlin, WI 53151
Sprint C/O Enhanced Recovery CORP 8014 Bayberry Rd Jacksonville, FL 32256	AT&T Wireless C/O Palisades Collection L 210 Sylvan Ave Englewood, NJ 07632	
Dish Network C/O ER Solutions 800 Sw 39Th St Renton, WA 98057	GEMB/Sam's Club Attn: Bankruptcy Dept. Po Box 981400 El Paso, TX 79998	
U.S. Cellular C/O I C System INC Po Box 64378 Saint Paul, MN 55164	Equifax Attn: Bankruptcy Dept. PO Box 740241 Atlanta, GA 30374	
Citi Auto Attn: Bankruptcy Dept. 2208 Highway 121 Ste 100 Bedford, TX 76021	Experian Attn: Bankruptcy Dept. PO Box 2002 Allen, TX 75013	
Sprint C/O Enhanced Recovery CORP 8014 Bayberry Rd Jacksonville, FL 32256	Transunion Attn: Bankruptcy Dept. PO Box 1000 Chester, PA 19022	
T-Mobile C/O Bureau OF Collection R 7575 Corporate Way Eden Prairie, MN 55344	Kohls/Chase Attn: Bankruptcy Dept. N56 W 17000 Ridgewood Dr Menomonee Falls, WI 53051	
Sprint C/O ER Solutions 800 Sw 39Th St Renton, WA 98057	Advance America Bankruptcy Department 4003 Durand Ave. Racine, WI 53405	
Progressive Insurance C/O NCO FIN/99 Po Box 15636 Wilmington, DE 19850	Wheaton Franciscan Med. Gro Bankruptcy Department PO Box 68-9711 Milwaukee, WI 53268	
Wisconsin Electric Power Attn: Bankruptcy Dept. 231 W Michigan St A130 Milwaukee, WI 53203	Racine Water Attn: Bankruptcy Dept. 800 Center Street Racine, WI 53403	